

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

VIRDA BELL BULLARD; et. al.)	
)	
Plaintiffs,)	
)	
vs.)	
)	Case No. 07-C-6883
BURLINGTON NORTHERN SANTA)	
FE RAILWAY COMPANY; KOPPERS)	Judge Kennelly
INDUSTRIES, INC.; MONSANTO)	Magistrate Judge Ashman
COMPANY; DOW CHEMICAL)	
COMPANY; AND VULCAN)	
MATERIALS COMPANY)	
)	
Defendants.)	
)	

DEFENDANTS' JOINT MOTION TO TRANSFER VENUE

Defendants BNSF RAILWAY COMPANY ("BNSF"),¹ KOPPERS INC. ("Koppers"),² MONSANTO COMPANY ("Monsanto"),³ THE DOW CHEMICAL COMPANY ("Dow"),⁴ and VULCAN MATERIALS COMPANY ("Vulcan"), hereby move this Court, pursuant 28 U.S.C. § 1404(a), for an order transferring venue of this action to the United States District Court for the Western District of Texas, Austin Division for the reasons set forth in the attached memorandum of law.

¹ BNSF is incorrectly identified as "Burlington Northern Santa Fe Railway Company" in Plaintiffs' Complaint.

² Koppers is incorrectly identified as "Koppers Industries, Inc." in Plaintiffs' Complaint.

³ The subject matter of this lawsuit relates to time periods before Monsanto was incorporated, and to products that were never manufactured, sold, and/or distributed by Monsanto. Monsanto was incorporated on February 9, 2000. The subject matter of this lawsuit relates to the alleged actions, and former business, of Pharmacia Corporation, f/k/a Monsanto Company.

⁴ Dow is incorrectly identified as "Dow Chemical Company" in Plaintiffs' Complaint.

Respectfully submitted,

BNSF RAILWAY COMPANY

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CERTIFICATE OF SERVICE

I, Robert L. Shuftan, an attorney, state that I have served true and correct copies of the foregoing *Defendants' Joint Motion to Transfer Venue* upon the below attorneys via overnight mail on December 13, 2007 and upon all other attorneys of record through the Court's CM/ECF system:

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